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6 *Attorneys for Defendant*  
7 *Nevada Gold Mines*

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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 JUAN ULLOA,

13 Plaintiff,

14 vs.

15 NEVADA GOLD MINES, a Delaware Limited  
Liability Company,

16 Defendant.

Case No.: 3:21-cv-00495-RCJ-CSD

**ORDER TO EXTEND DEFENDANT'S  
DEADLINE TO REPLY TO DISPOSITIVE  
MOTION**

**[Second Request]**

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18 Defendant NEVADA GOLD MINES ("Defendant" or "NGM"), by and through its  
19 undersigned counsel of record SIMONS HALL JOHNSTON PC, and Plaintiff JUAN ULLOA,  
20 ("Ulloa") by and through his undersigned counsel of record KEMP & KEMP hereby stipulate and  
21 agree that the deadline for the reply in support of Defendant's motion for summary judgment will  
22 be extended to two (2) weeks from September 20, 2023 to **October 4, 2023**. Defendant's counsel  
23 is currently serving as the lead negotiator for four (4) separate bargaining units for a large  
24 governmental employer who are presently negotiating their collective bargaining agreements; is  
25 presently advising on the sale of two significantly sized businesses with union issues, is assisting  
26 another client through a union campaign with an election scheduled next week, and is presently  
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1 drafting an urgent temporary restraining order in a trade secrets matter. The parties believe a (2)  
2 week extension will enable them to complete the reply to the dispositive motion without any  
3 further delay.

4 This request is not made for the purpose of delay and is made in good faith.  
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6  
7 DATED: September 19, 2023

DATED: September 19, 2023

8 KEMP & KEMP

SIMONS HALL JOHNSTON PC

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10 /s/ James P. Kemp  
11 James P. Kemp, Esq.  
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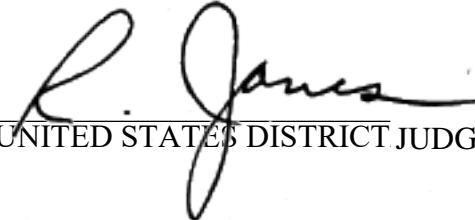
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*Attorneys for Defendant*

18 **ORDER**

19 **IT IS SO ORDERED.**

20 September 20, 2023

21 Dated: \_\_\_\_\_

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23 UNITED STATES DISTRICT JUDGE  
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